

Proposed Objection Deadline: December 17, 2018 at 4:00 p.m. (AST)
Proposed Hearing Date and Time: December 19, 2018 at 9:30 a.m. (AST)

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

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In re: PROMESA
Title III
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO, No. 17 BK 3283-LTS
as representative of (Jointly Administered)
THE COMMONWEALTH OF PUERTO RICO, et
al.,
Debtors.¹

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In re: PROMESA
Title III
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO, No. 17 BK 3284-LTS
as representative of
THE PUERTO RICO SALES TAX FINANCING
CORPORATION, **This Urgent Consensual Motion
relates to the Commonwealth and
COFINA and shall be filed in Case
Nos. 17 BK 3283-LTS and 17 BK
3284-LTS.**
Debtor.
-----X

NOTICE OF URGENT CONSENSUAL MOTION

PLEASE TAKE NOTICE that the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as representative of the Puerto Rico Sales Tax Financing Corporation (“COFINA”) in its Title III Case pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”), is filing the annexed *Urgent*

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Consensual Motion for Entry of Order Establishing Procedures Regarding Section 19.5 of the COFINA Plan of Adjustment (the “Urgent Consensual Motion”).

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Urgent Consensual Motion must be in writing, must conform to the Federal Rules of Bankruptcy Procedure and the *Seventh Amended Notice, Case Management and Administrative Procedures* [Case No. 17-3283, ECF No. 4086-1] (the “Case Management Procedures”), and must be filed with the Court (a) by registered users of the Court’s case filing system, electronically in accordance with rule 5 of the Local Rules for the District of Puerto Rico, and (b) by all other parties in interest, on a CDROM, in text-searchable portable document format (PDF), and served on (i) counsel for the Oversight Board, Proskauer Rose LLP, Eleven Times Square, New York, New York 10036-8299 (Attn: Martin J. Bienenstock, Esq., Brian S. Rosen, Esq., and Jeffrey W. Levitan, Esq.), and O’Neill & Borges LLC, 250 Muñoz Rivera Ave., Suite 800, San Juan, PR 00918-1813 (Attn: Hermann D. Bauer, Esq.); (ii) counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority, O’Melveny & Myers LLP, 7 Times Square, New York, New York 10036 (Attn: John J. Rapisardi, Esq., Suzanne Uhland, Esq., and Peter Friedman, Esq.) and Marini Pietrantoni Muñoz LLC, MCS Plaza, Suite 500, 255 Ponce de León Ave., San Juan, Puerto Rico 00917 (Attn: Luis C. Marini-Biaggi, Esq.); (iii) the Office of the United States Trustee for Region 21, Edificio Ochoa, 500 Tanca Street, Suite 301, San Juan, Puerto Rico 00901-1922; (iv) counsel to Whitebox Advisors LLC, Wollmuth Maher & Deutsch LLP, 500 Fifth Avenue, New York, New York 10110 (Attn: Brant D. Kuehn, Esq.); (v) counsel for Ambac Assurance Corp., Curtis, Mallet-Prevost, Colt & Mosle LLP, 101 Park Avenue, New York, New York 10178-0061 (Attn: Michael J. Moscato, Esq.); and (vi) counsel for The Bank of New York Mellon, Reed Smith LLP, 225 Fifth

Avenue, Suite 1200, Pittsburgh, Pennsylvania 15222 (Attn: Eric A. Schaffer, Esq.), so as to be received no later than **December 17, 2018, at 4:00 p.m. (AST)**.

PLEASE TAKE FURTHER NOTICE that a hearing will be held before the Honorable Laura Taylor Swain, United States District Court Judge, on **December 19, 2018, at 9:30 a.m. (AST) in San Juan** at the United States District Court for the District of Puerto Rico, **Clemente Ruiz Nazario United States Courthouse, 150 Carlos Chardón Avenue, San Juan, P.R. 00918, Courtroom 5**, or at a courtroom to be later determined, to consider the relief sought by the Debtor in the Urgent Consensual Motion.

PLEASE TAKE FURTHER NOTICE that copies of the Urgent Consensual Motion and all documents filed in these title III cases are available (a) free of charge by visiting <https://cases.primeclerk.com/puertorico> or by calling +1 (844) 822-9231, and (b) on the Court's website at <http://www.prd.uscourts.gov>, subject to the procedures and fees set forth therein.

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Dated: December 12, 2018
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock

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3284-LTS.**
Debtor.
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**URGENT CONSENSUAL MOTION
FOR ENTRY OF ORDER ESTABLISHING PROCEDURES
REGARDING SECTION 19.5 OF THE COFINA PLAN OF ADJUSTMENT**

To the Honorable United States District Court Judge Laura Taylor Swain:

The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”),
as representative of the Puerto Rico Sales Tax Financing Corporation (“COFINA”) in its Title III

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Case pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² respectfully submits this urgent consensual motion (the “Urgent Consensual Motion”), for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), establishing procedures regarding Section 19.5 of the COFINA Plan (as defined below).³ In support of this Urgent Consensual Motion, the Oversight Board respectfully represents as follows:

Preliminary Statement

1. The relief requested herein arises from (a) the Lawsuits (as defined below), which are premised mainly upon allegations that an event of default occurred under the Existing Bond Resolution prior to April 29, 2017, and that BNYM (as defined below) allegedly breached duties to Whitebox and Ambac (both as defined below) by failing to declare such defaults and resign as trustee of the “Senior” and “First Subordinate” Existing Securities and (b) BNYM’s asserted right of indemnity with respect to the Lawsuits. The COFINA Plan provides for the Court to determine whether BNYM is entitled to any security from Whitebox or Ambac, in the form of a distribution holdback or a bond being posted for the benefit of BNYM in connection with fees and expenses which may be incurred by BNYM in the defense of the Lawsuits, and, if such security is warranted, the amount thereof. As a result of discussions with the Mediation Team, the Oversight Board, together with counsel for BNYM, Whitebox, and Ambac, jointly developed procedures regarding consideration of the dispute contemplated in Section 19.5 of the COFINA Plan, with all parties reserving all substantive rights and objections. The Oversight Board submits that the Court should enter the proposed order attached hereto as **Exhibit A**, approving the procedures outlined herein.

² PROMESA has been codified in 48 U.S.C. §§ 2101–2241.

³ Capitalized terms used but not defined herein shall have the meanings given to them in the COFINA Plan.

The Oversight Board will update the agenda for the upcoming omnibus hearing on December 19, 2018 to incorporate a pretrial conference regarding COFINA Plan confirmation, so that this Urgent Consensual Motion can be heard at such hearing.

Background

2. On April 12, 2017, plaintiffs Whitebox Multi-Strategy Partners, L.P. and certain of its affiliates (collectively, “Whitebox”) commenced a civil action against The Bank of New York Mellon (“BNYM”), as the trustee for sales tax revenue bonds issued by COFINA, styled *Whitebox Multi-Strategy Partners, L.P., et al. v Bank of New York Mellon Corp.*, 651969/2017 (Sup. Ct. N.Y. County April 12, 2017) (the “Whitebox Lawsuit”), in the New York Supreme Court, County of New York. The Whitebox Lawsuit was removed to the United States District Court for the Southern District of New York [Case No. 17-CV-3750-LTS], and venue was transferred to this Court [Adv. Proc. No. 17-AP-143-LTS]. Pursuant to an order entered by the Court in the Interpleader Action (as defined below), the Whitebox Lawsuit is stayed pending further order of the Court.

3. On May 2, 2017, Ambac commenced a civil action against BNYM, as the trustee for sales tax revenue bonds issued by COFINA, styled *Ambac Assurance Corp. v. The Bank of New York Mellon*, 652356/2017 (Sup. Ct. N.Y. May 2, 2017) (the “Ambac Lawsuit” and, together with the Whitebox Lawsuit, the “Lawsuits”), in the New York Supreme Court, County of New York. The Ambac Lawsuit was removed to the United States District Court for the Southern District of New York, and BNYM has requested that venue be transferred to this Court. Pursuant to an order entered by the Court in the Interpleader Action (as defined below), the Ambac Lawsuit is stayed pending further order of the Court.

4. On May 16, 2017, shortly after the commencement of the COFINA Title III Case, BNYM, as the trustee for COFINA's Existing Securities, filed an interpleader action in this Court (the "Interpleader Action"), seeking a court order determining competing claims to the funds generated from the Pledged Sales Taxes held in BNYM's possession (the "Disputed Funds") by certain holders of beneficial interests in the Existing Securities (including Whitebox and Ambac), insurers of the Existing Securities (including Ambac), and COFINA.⁴ On May 30, 2017, the Court granted the interpleader request and ordered the Disputed Funds remain in trust and no distributions made until the Court issues a final ruling in the Interpleader Action. On September 27, 2018, in light of the agreements and compromises under the Settlement of the Commonwealth-COFINA Dispute, the Court, *sua sponte*, entered an order terminating then pending summary judgment motions (which were *sub judice*), without prejudice to restoration of the motions on or after October 1, 2018 [Adv. Proc. No. 17-00133, ECF. No. 518].

5. On October 19, 2018, COFINA filed the *Title III Plan of Adjustment of Puerto Rico Sales Tax Financing Corporation* [Case No. 17-3284, ECF No. 309], as amended on November 16, 2018 [Case No. 17-3284, ECF No. 352], as further amended on November 26, 2018 [Case No. 17-3284, ECF No. 367], and as corrected on November 30, 2018 [Case No. 17-3284, ECF No. 380] (as may be further amended, supplemented, or modified, the "COFINA Plan").

6. Section 19.5 of the COFINA Plan provides, in relevant part, that:

notwithstanding the foregoing or anything contained in the Plan to the contrary, including, without limitation, Sections 19.6(ii) and 19.13 hereof, except as set forth in the following proviso, no distribution to be made pursuant to the Plan, either through the Disbursing Agent or BNYM as trustee of the Existing Securities, may be withheld as a result of, or on account of, the claims, causes of action and damages being asserted in the

⁴ Through the Interpleader Action, BNYM also sought certain declaratory relief against all defendants (including Whitebox and Ambac) relating to the existence or non-existence of a default or event of default under the Existing Bond Resolution.

Ambac Action and the Whitebox Actions; and provided, further, that, with respect to Ambac and Whitebox and the Ambac Action and the Whitebox Actions, respectively, at the Confirmation Hearing, the Title III Court shall determine (a) what amount, if any, shall be either (i) withheld by the Disbursing Agent or BNYM as trustee for the Existing Securities or (ii) posted by Ambac and Whitebox as collateral for the reimbursement of fees and expenses which may be incurred by BNYM in connection with the defense of the Ambac Action and the Whitebox Actions, and (b) whether BNYM shall be reimbursed by Ambac and Whitebox for the incurrence of any such fees and expenses from either the holdback amount or collateral posted and referred to in the preceding subsection (a) on a current basis or upon entry of a Final Order in connection with the Ambac Action and the Whitebox Actions.

COFINA Plan § 19.5.

Relief Requested

7. To facilitate a resolution of the dispute contemplated in Section 19.5 of the COFINA Plan (the “Dispute”), the Oversight Board, the Mediation Team, and counsel to BNYM, Whitebox, and Ambac consensually agreed upon the procedures described herein, with all parties reserving any substantive rights and objections.⁵ Accordingly, the Oversight Board hereby requests entry of an order establishing the following briefing and discovery schedule with respect to the Dispute:

- **January 2, 2019:**

- Deadline by which BNYM must file any brief/declarations supporting the amount BNYM contends should either be withheld from distributions to Whitebox and Ambac or posted by Whitebox and Ambac pursuant to Section 19.5 of the COFINA Plan.
- Deadline by which Whitebox and Ambac must file any brief/declarations supporting their position that no amounts are required either to be withheld from their distributions or posted by Whitebox and Ambac pursuant to Section 19.5 of the COFINA Plan or applicable documents and laws.

⁵ The Oversight Board will update the agenda for the upcoming omnibus hearing on December 19, 2018 to incorporate a status conference regarding COFINA Plan confirmation, so that this Urgent Consensual Motion can be heard at such hearing.

- **January 9, 2019:**

- Deadline by which BNYM must file any responsive papers to the Whitebox and Ambac brief/declarations regarding BNYM's asserted entitlement to withhold amounts or require amounts to be posted in accordance with Section 19.5 of the COFINA Plan.
- Deadline by which Whitebox and Ambac must file any responsive papers, including opposing declarations, to BNYM's brief/declarations regarding the amounts, if any, to be withheld from distributions or posted by Whitebox and Ambac in accordance with Section 19.5 of the COFINA Plan.

- **January 10 – 15, 2019:**

- BNYM, Whitebox, and/or Ambac may take deposition testimony from any of the declarants regarding the Dispute.

- **January 16, 2019:**

- Hearing to consider whether any amounts should be withheld from distributions to Whitebox and Ambac or posted by Whitebox and Ambac in accordance with Section 19.5 of the COFINA Plan and applicable documents and laws. In the event that the Court determines that some amounts should be withheld or posted, evidence regarding the amounts to be so withheld or posted shall be presented at the hearing.
- Any declarations and supporting exhibits filed by BNYM, Whitebox, and Ambac regarding the Dispute shall be treated as direct testimony. The declarants pertaining to such declarations shall be available for cross-examination, redirect, and rebuttal testimony at the hearing.⁶

8. Pursuant to Paragraph I.H of the Case Management Procedures, the Oversight Board hereby certifies that (i) it has carefully examined the matter and concluded that there is a true need for an urgent motion, (ii) it has not created the urgency through any lack of due diligence, (iii) it has made a bona fide effort to resolve the matter without a hearing, and (iv) it has made reasonable, good-faith communications in an effort to resolve or narrow the issues that are being brought to the Court. Additionally, the Oversight Board has conferred with the Mediation Team,

⁶ The declarations submitted pursuant to these procedures may be from fact or expert witnesses. The parties shall not be required to submit any written reports or additional disclosures relating to expert witnesses beyond the declarations and deposition testimony submitted or taken pursuant to these procedures.

counsel to BNYM, counsel to Whitebox, and counsel to Ambac, and all such parties consent to the relief sought in this Urgent Consensual Motion.

Notice

9. The Oversight Board has provided notice of this Urgent Consensual Motion to: (a) the Office of the United States Trustee for the District of Puerto Rico; (b) the indenture trustees and/or agents, as applicable, for COFINA's bonds; (c) the entities on the list of creditors holding the 20 largest unsecured claims against COFINA; (d) the statutory committees appointed in any of the Title III Cases; (e) the Office of the United States Attorney for the District of Puerto Rico; (f) counsel to the Puerto Rico Fiscal Agency and Financial Advisory Authority; (g) the Puerto Rico Department of Justice; and (h) all parties requesting notice pursuant to Bankruptcy Rule 2002. The Oversight Board submits that, in light of the nature of the relief requested, no other or further notice need be given.

No Prior Request

10. No prior request for the relief sought in this Urgent Consensual Motion has been made to this or any other court.

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WHEREFORE the Oversight Board respectfully requests the Court to enter an order, substantially in the form attached hereto as **Exhibit A**, (a) granting this Urgent Consensual Motion, and (b) granting such other relief as is just and proper.

Dated: December 12, 2018
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock

Martin J. Bienenstock
Brian S. Rosen
Jeffrey W. Levitan
Chris Theodoridis
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*Attorneys for the Financial
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/s/ Hermann D. Bauer

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*Co-Attorneys for the Financial
Oversight and Management Board
as representative for COFINA*

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

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In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, et al., Debtors. ¹	PROMESA Title III No. 17 BK 3283-LTS (Jointly Administered)
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In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE PUERTO RICO SALES TAX FINANCING CORPORATION, Debtor.	PROMESA Title III No. 17 BK 3284-LTS This Order relates to the Commonwealth and COFINA and shall be filed in Case Nos. 17 BK 3283-LTS and 17 BK 3284-LTS.
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**ORDER GRANTING URGENT CONSENSUAL MOTION
FOR ENTRY OF ORDER ESTABLISHING PROCEDURES
REGARDING SECTION 19.5 OF THE COFINA PLAN OF ADJUSTMENT**

Upon the *Urgent Consensual Motion for Entry of Order Establishing Procedures Regarding Section 19.5 of the COFINA Plan of Adjustment* (the “Urgent Consensual Motion”);²

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms used but not otherwise defined herein have the meanings given to them in the Urgent Consensual Motion.

and the Court having found it has subject matter jurisdiction over this matter pursuant to PROMESA section 306(a); and it appearing that venue is proper pursuant to PROMESA section 307(a); and the Court having found that the relief requested in the Urgent Consensual Motion is in the best interests of COFINA, its creditors, and other parties in interest, it is **HEREBY ORDERED THAT:**

1. The Urgent Consensual Motion is granted as set forth herein.
2. BNYM shall file any brief/declarations supporting the amount BNYM contends should either be withheld from distributions to Whitebox and Ambac or posted by Whitebox and Ambac pursuant to Section 19.5 of the COFINA Plan by **January 2, 2019 at 4:00 p.m. (AST)**.
3. Whitebox and Ambac shall file any brief/declarations supporting their position that no amounts are required either to be withheld from their distributions or posted by Whitebox and Ambac pursuant to the COFINA Plan or applicable documents and laws by **January 2, 2019 at 4:00 p.m. (AST)**.
4. BNYM shall file any responsive papers to the Whitebox and Ambac brief/declarations regarding BNYM's asserted entitlement to withhold amounts or require amounts to be posted in accordance with Section 19.5 of the COFINA Plan by **January 9, 2019 at 4:00 p.m. (AST)**.
5. Whitebox and Ambac shall file any responsive papers, including opposing declarations, to BNYM's brief/declarations regarding the amounts, if any, to be withheld from distributions or posted by Whitebox and Ambac in accordance with Section 19.5 of the COFINA Plan by **January 9, 2019 at 4:00 p.m. (AST)**.
6. BNYM, Whitebox, and/or Ambac may take deposition testimony from any of the declarants during the period of **January 10 – 15, 2019**.

7. The hearing to consider whether any amounts should be withheld from distributions to Whitebox and Ambac or posted by Whitebox and Ambac in accordance with Section 19.5 of the COFINA Plan and applicable documents and laws shall be held on **January 16, 2019, at 9:30 a.m. (AST) in San Juan**, and continued, if necessary, on **January 17, 2019 at 9:30 a.m. (AST)** at the United States District Court for the District of Puerto Rico, **Clemente Ruiz Nazario United States Courthouse, 150 Carlos Chardón Avenue, San Juan, P.R. 00918, Courtroom 5**, or at a courtroom to be later determined (the “Hearing”). In the event that the Court determines that some amounts should be withheld or posted, evidence regarding the amounts to be so withheld or posted shall be presented at the Hearing.

8. Any declarations and supporting exhibits filed by BNYM, Whitebox, and Ambac regarding the Dispute shall be treated as direct testimony. The declarants pertaining to such declarations shall be available for cross-examination, redirect, and rebuttal testimony at the Hearing.

9. The declarations submitted pursuant to this Order may be from fact or expert witnesses. The parties shall not be required to submit any written reports or additional disclosures relating to expert witnesses beyond the declarations and deposition testimony submitted or taken pursuant to this Order.

10. Nothing in this Order is intended to prejudice or limit (a) the parties’ rights, claims, or defenses against COFINA or each other, including, without limitation, any objections to confirmation of the COFINA Plan generally or specifically with respect to Section 19.5 of the COFINA Plan and any rights, claims, counterclaims, or defenses that have been or may be asserted in connection with the Lawsuits, the Interpleader Action, or any related litigation, all of which rights, claims, counterclaims, and defenses are expressly preserved or (b) the rights, claims, or

defenses of COFINA and the Oversight Board with respect to any such objections to confirmation of the COFINA Plan or otherwise asserted in the Lawsuits, the Interpleader Action, or any related litigation.

11. COFINA reserves the right to seek a rescheduling of the hearing dates established above subject to approval of this Court.

12. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

SO ORDERED.

Dated: December ____, 2018
San Juan, Puerto Rico

LAURA TAYLOR SWAIN
United States District Judge